



# Central Contra Costa Sanitary District

Protecting public health and the environment

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October 8, 2010

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ELAINE R. BOEHME  
Secretary of the District

California Regional Water Quality Control Board  
Central Valley Region  
**Attention: Ms. Kathleen Harder**  
11020 Sun Center Drive #200  
Rancho Cordova, CA 95670-6114

SENT VIA EMAIL: [kharder@waterboards.ca.gov](mailto:kharder@waterboards.ca.gov)

Subject: Tentative Waste Discharge Requirements Renewal (NPDES No. CA0077682) for Sacramento Regional County Sanitation District and Sacramento Regional Wastewater Treatment Plant, Sacramento County

Dear Ms. Harder:

The Central Contra Costa Sanitary District (CCCSD) appreciates the opportunity to comment on the National Pollutant Discharge Elimination System (NPDES) Permit renewal package for the Sacramento Regional County Sanitation District (SRCSD) Wastewater Treatment Plant. CCCSD discharges into the Suisun Bay. Therefore, this proposed permit raises issues that could have substantial implications for our District.

CCCSD's mission is to protect public health and the environment. Our District supports the use of reasonable measures to protect the Bay/Delta region. However, CCCSD is concerned that the proposed permit would impose requirements that lack a sound scientific and technical basis. These requirements would necessitate a significant financial investment and generate large amounts of green house gases, potentially without demonstrated improvements to the ecosystem.

CCCSD views this tentative permit as raising both complicated technical issues and extremely difficult Statewide policy issues. CCCSD understands that Regional Boards typically reject legal arguments that their NPDES related decisions require either evaluation of economic considerations or CEQA review. However, the looming mega public policy issue which this Regional Board and other regulators face is how can our society successfully address both the requirements of specific existing environmental regulations and the daunting challenges of meeting requirements of AB 32? Moreover, how can these dual objectives be met without a fundamental modification of the manner in which our State agencies evaluate the cost benefit of regulatory actions during this depressed economic cycle? The issue is not whether the Regional Board may be able

to lawfully avoid a thorough and balanced consideration of these issues, but whether sound public policy demands a fully integrated approach to these competing issues.

A brief listing of our concerns is attached in Table format as requested.

We ask that the Regional Water Board reconsider the proposed requirements and release a revised permit for review and comment that is consistent with applicable law, regulations, and accepted permitting practices.

Sincerely,

  
James M. Kelly  
General Manager

Attachment  
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